

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UBIQUITY, INC.,

Plaintiff,

v.

BRIAN KREBS and KREBS ON
SECURITY, LLC,

Defendants.

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Civil Action No. 1:22-CV-00352-RDA-IDD

**DEFENDANT KREBS ON SECURITY, LLC'S
CONSENT MOTION TO EXTEND TIME**

Pursuant to Local Rule 7, Defendant Krebs on Security, LLC ("Krebs on Security"), by and through undersigned counsel, moves for an extension of time to respond to Plaintiff's Complaint so that its response date corresponds with the response date of co-Defendant Brian Krebs.

Krebs on Security's response is currently due on June 6, 2022. Pursuant to the Waiver of the Service of Summons (ECF 14) filed with the Court today, Brian Krebs's response to the Complaint is due July 20, 2022. Defendants' counsel has conferred with Plaintiff's counsel and Plaintiff's counsel has consented to allowing Krebs on Security to have until July 20, 2022 to respond to the Complaint, the same date on which co-Defendant Brian Krebs's response is due.

Plaintiff and Defendant Krebs on Security, along with Defendant Brian Krebs, are presently engaged in discussions to potentially resolve the dispute. Under the circumstances and to avoid unnecessary litigation expenses, an extension for Krebs on Security until July 20, 2022, is reasonable and desirable to all parties, and will not prejudice any party.

Accordingly, Defendant Krebs on Security respectfully requests that it be given until and including July 20, 2022, to respond to the Complaint in this case.

NOTICE OF WAIVER OF ORAL ARGUMENT

Defendant Krebs on Security waives oral argument with regard to this Consent Motion to Extend Time.

Dated: June 2, 2022

Respectfully Submitted,

/s/ David S. Wachen

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Attorneys for Defendant
Krebs On Security, LLC

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CERTIFICATE OF SERVICE

I hereby certify that, on this 2d day of June, 2022, I caused a copy of the foregoing to be filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ David S. Wachen

David S. Wachen (VSB No. 96363)